

REMARKS

Claims 1-32, 34, 36, 38, 40 and 41 stand rejected under 35 USC 103(a) on Gore Jr. (U.S. Patent No. 5,826,029) in view of Lazaridis (U.S. Patent No. 7,000,001). Applicants respectfully traverse this rejection for the following reasons.

First, the Examiner has failed to particularly point out where in the cited references the features of applicants' claims are allegedly disclosed. While the Examiner cites to portions of the cited references (e.g., Gore Jr., col. 1, lines 53-67 & col. 2, lines 1-8), the Examiner does not indicate where in these citations the individual features of the claims are allegedly disclosed. Accordingly, the Examiner has failed to meet the burden required to establish a *prima facie* case of obviousness. Therefore, the rejection should be withdrawn.

Applicants also note that some of the Examiner's citations appear to have been inserted due to clerical errors. For instance, on p. 3 of the Office Action, the Examiner cites Gore Jr.'s col. 5, lines 42-66 as disclosing a claimed communication protocol – the cited text, however, is completely unrelated to the claimed feature and it begins and ends in the middle of long sentences. This erroneous citation appears to be an artifact from prior office actions in which the Examiner cited col. 5, lines 42-66 of Friday (U.S. Patent No. 6,631,837) as disclosing uni-directional connections. Because some of the citations are the result of clerical errors, the rejection should be withdrawn.

Second, the cited references fail to teach or suggest many of the claimed features. Claim 1, for instance, recites a portable terminal that establishes a connection with an image data transmission device via “[a] second internal network, [a] second firewall, [an] external network, [a] first firewall and [a] first internal network.” The cited references fail to teach or suggest this feature.

The Examiner cites Gore Jr.'s col. 1, lines 53-67 & col. 2, lines 1-8 as disclosing the above interconnections. The cited text, however, does not mention even one firewall, let alone first and second firewalls as claimed. Moreover, the cited text mentions only an “internal computer system” and an “external system.” Thus, even if these systems were separated by a firewall, it would constitute only one firewall as opposed to the first and second firewalls required by claim 1.

Because Gore Jr. fails to disclose the above interconnections, the rejection of claim 1 should be withdrawn.

Referring still to claim 1, the Examiner concedes that Gore Jr. fails to disclose an “image printing device establishing a connection with [a] file server via [a] second internal network, [a] second firewall, and [an] external network using a protocol which allows only uni-directional connections from the second internal network to the external network at [a] second firewall.” The Examiner asserts, however, that such an image printing device is disclosed in Lazaridis and that it would have been obvious to combine Gore Jr. with Lazaridis to produce the claimed invention. Applicants respectfully disagree.

The Examiner compares the claimed image printing device with a printer disclosed in Lazaridis’s col. 5, lines 14-23. In making this comparison, the Examiner argues that “One ordinary skill in the art at the time of the invention knows that the printer communicate through serial port and they are unidirectional and the information is output one way and get printed.” (See, Office Action, p. 4.) In other words, the Examiner apparently argues that Lazaridis’s printer inherently establishes a connection with a file server, through a second firewall, using a protocol allowing only uni-directional connections. Applicants respectfully disagree.

The cited text in Lazaridis describes basic network communications between Lazaridis’s printer and a wireless device using conventional protocols. Lazaridis does not teach or suggest that any of these protocols is restricted to uni-directional communication. Additionally, the cited text does not teach or suggest that the communications are made through a serial port or through a firewall. And even if the cited text did teach or suggest the use of a serial port, this fact would not support the Examiner’s position because most serial ports are not restricted to uni-directional communication. For instance, even a simple RS232 serial connector typically allows bi-directional communication.

Additionally, the cited text does not state that Lazaridis’s printer establishes any type of connection with a file server; rather, it explains that the printer receives communications directly from a wireless device after the wireless device retrieves the printer’s address from a web-server. (See, e.g., col. 5, lines 17-19.) Finally, the cited text fails to mention anything about communication

across a firewall, let alone communication across a “second” firewall using a protocol that allows only uni-directional connections as claimed.

Because Lazaridis fails to disclose an “image printing device establishing a connection with [a] file server” via a “second firewall” and using a protocol that allows only uni-directional communications as required by claim 1, the rejection of claim 1 should be withdrawn.

Claims 7, 13, 15, 17, 21, 25, 28, 32, 34, 36, 38, 40 and 41 recite features similar to those discussed above in relation to claim 1 and are therefore allowable over Gore Jr. and Lazaridis for reasons similar to claim 1. Claims 2-6, 8-12, 14, 16-20, 22-24, 26, 27 and 29-31 depend from allowable independent claims and are therefore allowable due at least to their respective dependencies.

Applicants solicit an early response allowing the claims. To expedite prosecution of this application, applicants would like the Examiner to have an interview with applicants’ representative after filing this Response.

In the event the U.S. Patent and Trademark Office determines that an extension and/or other relief is required, applicants petition for any required relief including extensions of time and authorize the Commissioner to charge the cost of such petitions and/or other fees due in connection with the filing of this document to Deposit Account No. 03-1952 referencing Docket No.

325772028100.

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